

**New Hampshire Department of Transportation  
Bureau Of Highway Maintenance**

**Findings Tracking Log  
EIP-14-Form 14b**

Bureau/District Bureau of Highway Maintenance EMS Audit Date 2014

<b><i>Finding No.</i></b>	<b><i>Description</i></b>	<b><i>Priority</i></b>	<b><i>Responsible Party</i></b>	<b><i>Due Date</i></b>	<b><i>Status/Notes</i></b>
EIP-1 1	OSC to conduct "annual" review of Environmental Policy.	Low	OSC	2015	EIP-1 revised to indicate Environmental Policy will be reviewed periodically.  Completed March 2015
EIP-1 2	Variation of understanding of Environmental Policy with position in the Bureau	Low	Bureau/OSC	2015	This finding meets Bureau expectation. The level of understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities.  Completed March 2015
EIP-1 3	Location of official Environmental Policy as noted on the Environmental Documents log is incorrect.	Low	Bureau	2015	EIP-1 revised to indicated correct location being the "Hearing Examiner's Office."  Completed March 2015
EIP-2 1	Some recent activities are not included in the Activity Pick Lis	Low	Bureau	2015	Review activity pick list to update.
EIP-2 2	OSC has not been included in activities as required by the procedure	Low	Bureau	2015	EIP-2 revised to reflect appropriate level of OSC participation.  Completed March 2015

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EIP-3 1	Advocate versus Assurance	Low	Bureau	2015	EIP-3 language to remain as written. Completed March 2015
EIP-3 2	The Legal and Other Requirements not reviewed annually in accordance with EIP.	Low	Bureau/OSC	2015	EIP-3 revised to indicate Legal and Other Requirements will be reviewed periodically. Completed March 2015
EIP-3 3	EIP-3-Form 3b is not reviewed annually.	Low	Bureau	2015	EIP-3 revised to indicate Form 3b will be reviewed periodically. Completed March 2015
EIP-4 1	Responsibility for ensuring Bureau employees understand Bureau objectives and targets is not specified.	Low	Bureau	2015	EIP-4 to be revised to add District Engineer role and responsibilities. The level of understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities. Completed March 2015
EIP-4 2	EIP document does not allow for the views of interested parties to be considered when establishing and reviewing objectives and targets.	Low	Bureau	2015	The "interested parties" language is part of ISO14001 which is a guide and not a requirement for our EMS program. No change planned. Completed March 2015

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EIP-4 3	The objectives and targets matrix has not been updated. Use a separate form to track active and complete objectives and targets.	Low	Bureau	2015	EIP-4-Form 4a is up to date. Utilization of separate forms to track active and complete objectives and targets is not planned.  Complete March 2015
EIP-5 1	Responsibility for action items was assigned to a team or group that did not have an individual responsible to manage it activities or monitor progress.	Low	Bureau	2015	This is plainly identified in EIP-5 as the overall responsibility Bureau EMS Coordinator. As a Bureau with many Districts, management of activities may be delegated to appropriate District or Bureau staff.  Complete March 2015
EIP-5 2	Date and time frame designation in the Action Plan are inconsistent, (e.g. Schedule includes: "monthly", "3/10/10", and "September 2010".	Low	Bureau	2015	Bureau will use planned "month year" nomenclature in the schedule column from this point forward.  Completed March 2015
EIP-5 3	The Bureau's Action Plan does not include all information required by EIP-5. Identify performance indicators for each action and develop baselines.	Low	Bureau	2015	EIP-5 revised to allow flexibility in tracking progress.  Completed March 2015
EIP-6 1	Advocate versus Assurance	Low	Bureau	2015	EIP language to remain as written. EIP revised to add District Engineer responsibilities.  Completed March 2015

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EIP-6 2	The procedure requires the Bureau to review its organization chart annually and submit to the Division Director.	Low	Bureau	2015	EIP revised to indicate organization chart will be reviewed periodically. Division Director has an updated copy of the Bureau EMS Manual which includes a copy of the organization chart.  Completed March 2015
EIP-7 1	Advocate versus Assurance.	Low	Bureau	2015	EIP language to remain as written.  Completed March 2015
EIP-7 2	The Bureau assesses employee competence utilizing OSC audit results.	Low	Bureau	2015	EIP-7-Form 7b provides four methods of evaluation including: 1) Patrol Shed Peer Review Audits, 2) OSC Audits, 3) Patrol Shed Monthly Inspections, and 4) Patrol Shed Annual Inspections. EIP language to remain as written.  Completed March 2015
EIP-7 3	The Bureau's EIP-7 requires training to include an "overview of EMS" which is a lesser level of assurance than "the importance of conformity with policy and procedures and with the requirements of the environmental management system" included in sub clause 4.4.2, paragraph (a) of the standard.	Low	Bureau	2015	The standard is considered a guide and not a requirement. The level of understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities. EIP language to remain as written.  Completed March 2015.

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EIP-7 4	Awareness of “the environmental benefits of improved personal performance” is included in the procedure.	Low	Bureau	2015	The level of understanding is commensurate with staff position in the Bureau. Refer to EIP-Form 6a for a summary of Roles, Responsibilities, and Accountabilities. EIP language to remain as written.  Completed March 2015
EIP-7 5	The competence of contractors and suppliers working on Bureau facilities, and outside personnel utilizing Bureau refueling facilities is mostly not documented.	Low	Bureau	2015	Bureau has hundreds of completed “Contractor and Supplier Safety and Environmental Checklist” on file. For the most part, these are managed at the District and Patrol shed level for hired equipment. Where appropriate and justified statewide vendors completion of the checklist is managed at headquarters. A brochure to be distributed to outside users of the fuel distribution facilities is in the process of being prepared.  Completed ?
EIP-8 1	Strategies for internal communications about operational control procedures and work instructions, legal and regulatory requirements and the potential consequences of regulatory noncompliance, pollution prevention policies and initiatives, and employee reporting of environmental concerns and suggestions are not included in Form 8b.	Low	Bureau	2015	EIP-8 and EIP-8-Form 8b will be revised.  Completed March 2015

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EIP-8 2	Not all of the topics listed in EIP-8 Procedure Step # 1 for communications external to NHDOT are covered in Form 8b. Since the Bureau uses dispatchers to receive, document and track external communications, the procedure should be revised to reflect that practice rather than the use of the external communications log.	Low	Bureau	2015	Dispatchers do not have the depth and breath of knowledge to complete the EIP form. The District dispatch log is not intended to include the depth of detail as it relates to environmental concerns. EIP to be revised to clarify.  Completed March 2015
EIP-9 1	EIP does not include a provision for approving documents for adequacy prior to their use.	Low	Bureau	2015	EIP revised.  Completed March 2015
EIP-9 2	EIP does not include a provision for re-approving revised documents	Low	Bureau	2015	EIP revised.  Completed March 2015
EIP-9 3	EIP-9 includes a provision in step # 3 for an authorized key individual to be responsible for distribution of current controlled documents. On the Environmental Document Log, however, this role is assigned to the Bureau of Highway Maintenance.	Low	Bureau	2015	EIP revised  Completed March 2015

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EIP-9 4	EIP-9 includes a provision in step # 3 for an authorized key individual to be responsible for the removal of obsolete documents. On the Environmental Documents Log, however, this role is assigned to Bureau of Highway Maintenance.	Low	Bureau	2015	EIP revised. Completed March 2015
EIP-9 5	EIP-9 does not include a provision for disposal of records.	Low	Bureau	2015	EIP revised. Completed March 2015
EIP-10	The Monitoring and Measurement Matrix (Form 10a) provides an opportunity to track all the different ways the Bureau monitors its key activities. There is opportunity for more differentiation within the current matrix.	Low	Bureau	2015	Matrix revised. Completed March 2015
EIP-11	Revise Operational Controls Matrix to include work instruction WI-001 Wastewater Handling, work instruction WI-007 Vehicle Washing, and equipment tags (for the lead program).	Low	Bureau	2015	Matrix revised. Completed March 2015

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EIP-12	Fire drills are conducted at most Bureau facilities as least annually. Drills for other types of emergency situations are typically not conducted.	Low	Bureau	2015	EIP revised Complete March 2015 Conduct drills.
EIP-13 1	Advocate versus Assurance	Low	Bureau	2015	EIP language to remain as written. Completed March 2015
EIP-13 2	Actions taken in response to the identification of nonconformities vary among the Districts. Generally, the root cause analyses and the corrective and preventive action plans required by the procedure are not being conducted and developed.	Low	Bureau	2015	EIP revised. Completed March 2015
EIP-14	The EMS audit process as currently conducted, does not agree with the process originally envisioned and described in the procedural steps in EIP-14.	Low	Bureau	2015	Need to revise EIP to reflect the future internal audit process. Complete May 2017

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EIP-15	The compliance audit process as currently conducted, does not agree with the process as originally envisioned and described in the procedural steps in EIP-15.	Low	Bureau	2015	Need to revise EIP to reflect the future internal compliance evaluation process. Complete May 2017
EIP-16	EIP-16 as written does not include "follow-up actions form previous management reviews" in the list of management review topics in step # 3.	Low	Bureau	2015	EIP to remain as written. Completed march 2015

Date all findings were closed: \_\_\_\_\_